

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

-vs-

Case No. 18-CR-20489
Judge Thomas L. Ludington

JAMES D. PIERON, JR.,
Defendant.

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AFFIDAVIT OF ROSEMARIE URBANKSI, M.F.S.
OFFERED IN SUPPORT OF MOTION TO DISMISS

James D. Pieron, Jr., by and through his attorney, Kenneth R. Sasse, offers the attached affidavit of Rosemarie Urbanski, M.F.S., in support of the Motion To Dismiss (ECF No. 39) pending in this case.

s/Kenneth R. Sasse
Kenneth R. Sasse
Attorney for James D. Pieron
Kenneth R Sasse PLLC
27 E. Flint St., 2nd Floor
Lake Orion, Michigan 48362
(248) 821-7325
(P24365)

Dated: April 29, 2021

AFFIDAVIT OF ROSEMARIE URBANSKI, M.F.S.

I, Rosemarie Urbanski, upon her oath, deposes and says:

1. I hold a Master of Forensic Science degree. I am a Forensic Document Examiner. I interned with Arthur Walters, Board Certified Questioned Document Examiner, former Chief of the Questioned Document Section, Arizona Department of Public Safety and former Commander, U.S. Army Crime Laboratory, Questioned Document Section. Internship was served from 1988 through 1991 and continued collaborating with Mr. Walters in the forensic analysis of questioned documents until his death in 1997.

I have been in private practice since that time. I have participated in continuing education in forensic document examination on a regular basis. I am a member of numerous forensic organizations.

2. I have been retained by the Law Offices of Kenneth R. Sasse to perform a forensic examination of the following questioned signature, James Dayton Pieron, Jr., executed upon **Item Q-1**, photocopy of a Passport Issued to James Dayton Pieron, Jr. sent to Bruce Pollack via facsimile on 07/07/09.

3. The purpose of this examination was to determine whether the signature appearing upon the questioned passport and the photocopied passport were identical when compared to the known original Passport issued to James Dayton Pieron, Jr. issued December 8, 2006, **Item K-1**.

4. An examination and comparison of the signature appearing upon **Item Q-1** with the signature executed upon the original Passport, **Item K-1** was performed. A comparison of the questioned passport with the known original passport was also performed.

5. The visual examination of the questioned and known signatures and Passports was conducted with the unaided eye, various magnification devices and digitally scanned documents. The digital scans were supplied by the Law Office of Kenneth R. Sasse. The original known Passport was submitted by James Dayton Pieron, Jr.

6. Observations noted in the examination of the questioned and known signatures are as follows:

a.) The questioned signature, James Dayton Pieron, Jr., **Item Q-1**, is visible upon the photocopied facsimile and is of reasonable quality.

b). The photocopy of the questioned Passport as a whole, displays darkened areas.

7. Based upon my education, knowledge, experience, and the examination of **Item Q-1** and **Items K-1**, I have arrived at the following conclusions:

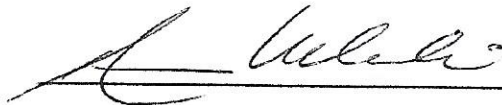
a). The signature upon **Item Q-1**, the questioned photocopy of the Passport, is identical to the signature of James Dayton Pieron, Jr. executed upon **Item K-1**, the original Passport issued upon December 8, 2006. **(Exhibit A)**

b). The questioned Passport, **Item Q-1**, is identical line for line with the known original Passport issued to James Dayton Pieron, Jr. issued upon December 8, 2006. **(Exhibit B)**

8. This opinion was solely based upon the examination of the documents as provided by Law Office of Kenneth R. Sasse and the original known Passport provided by James Dayton Pieron, Jr.

9. I reserve the right to update, amend and/or supplement this report as new information is provided to me.

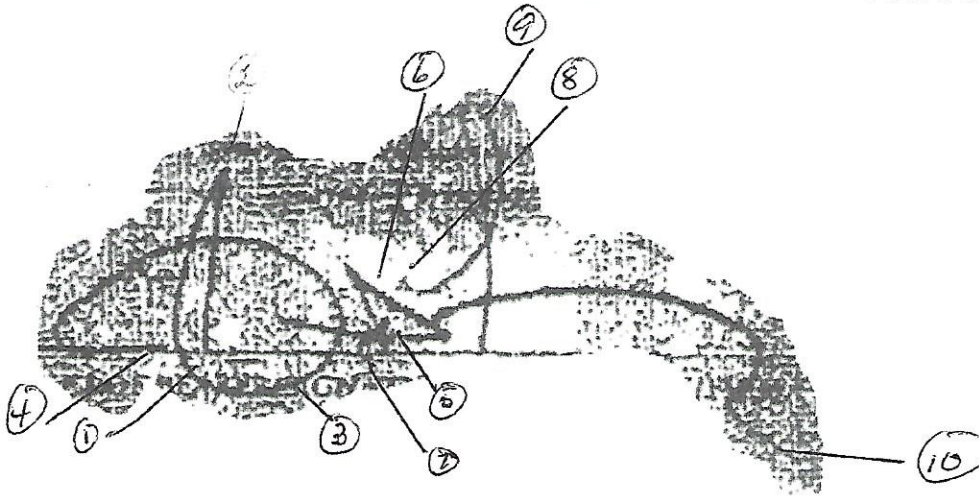
I declare under penalty of perjury that the foregoing is true and correct. Executed on this 28th day of April 2021, by Rosemarie Urbanski, M.F.S.

A handwritten signature in black ink, appearing to read 'Rosemarie Urbanski', written over a horizontal line.

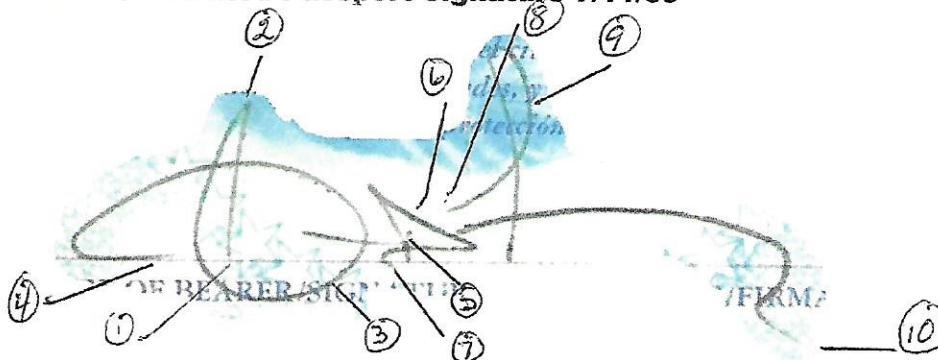
Rosemarie Urbanski, M.F.S.

EXHIBIT A

COMPARISON OF QUESTIONED PASSPORT SIGNATURE TO ORIGINAL KNOWN PASSPORT SIGNATURE OF JAMES DAYTON PIERON, JR.



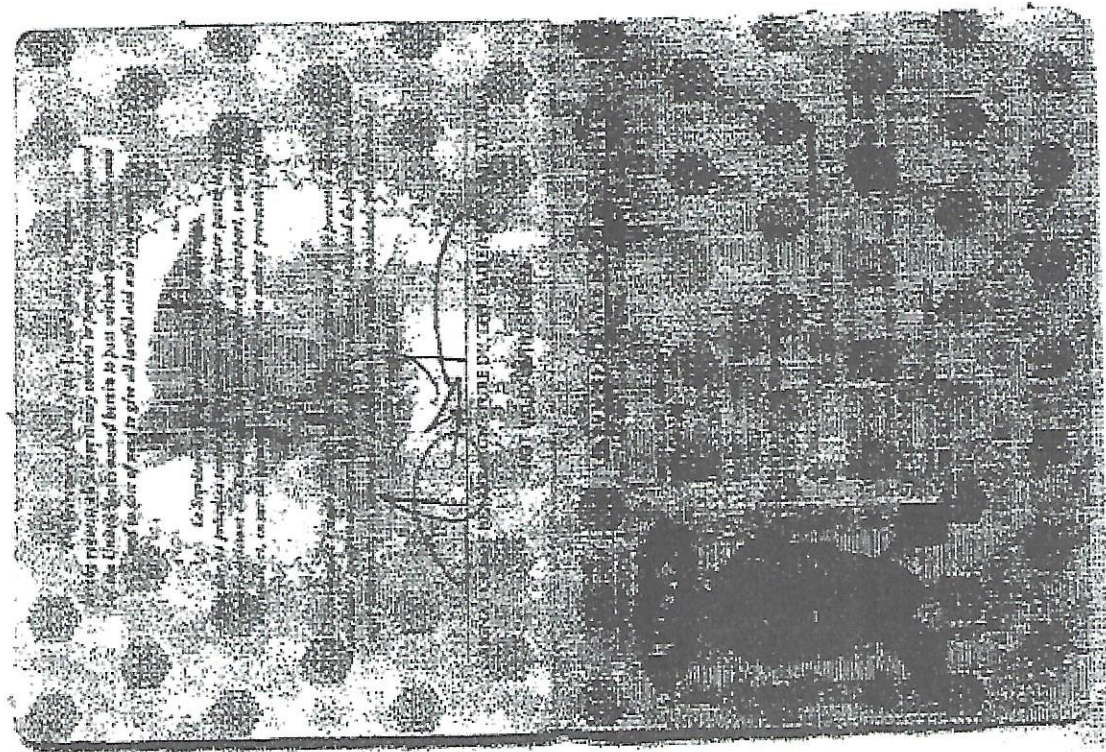
Q-1 Questioned Passport Signature 7/11/09



K-1 Original Passport Micrograph 4/15/21

SIMILARITIES: 1. Beginning stroke upper case "J"; 2. Peak at intersection of beginning ascending and continuing descending stroke; 3. Large lower bowl of the upper case "J"; 4. Ending stroke upper case "J"; 5. Beginning stroke upper case "D"; 6. Angled descending stroke upper case "D"; 7. Curved ending stroke upper case "D"; 8. Ending stroke of lower case "t"; 9. Loop of lower case "t"; 10. Ending stroke descends below baseline.

EXHIBIT B - QUESTIONED PASSPORT COMPARED TO KNOWN PASSPORT JAMES DAYTON PIERON, JR.



07 Jul 2009 20:03 JDFX

CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the attached filing with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

s/Kenneth R. Sasse
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Attorney for James Pieron, Jr.
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